

Chairman Reed E. Hundt
Federal Communications Commission
1919 M. Street, NW
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: NYNEX Telephone companies Revision to Tariff F.C.C. No. 1
FCC No. 94-356 (rel. 1/11/95)

Dear Chairman Hundt:

I urge you to immediately reconsider and rescind the above-referenced order ("Order"). It is counterproductive for the FCC to adopt such a rule interpretation. It will have the effect of reducing the demand for new communications products and services, at the very time when the telecommunications and electronics industries are investing billions of dollars to deliver innovative, productivity-enhancing products that rely on more and better use of bandwidth. This Order works against the goals established by the Vice President to speed development of the National Information Infrastructure, and it is harmful to the success and market expansion of 3Com, my employer.

The Order is bad for residential users, bad for business users, bad for telecommuters, bad for jobs in Silicon Valley and bad for our country. At a time when carriers, the networking industry and the computer industry are investing billions of dollars to deliver innovative, productivity-enhancing products that rely on more and more telecommunications bandwidth, the FCC should not adopt any rule interpretations which would directly reduce the demand for these new products and services. The Order significantly increases the monthly charges associated with ISDN subscriptions, and will undoubtedly decrease demand for ISDN.

The great technological achievement of ISDN -- the ability to create multiple channels from a single line -- becomes cost prohibitive under this Order. The Order will double the Subscriber Line Charge (SLC), applicable to B.R.I. (Basic Rate Interface) ISDN service and multiply by twenty-three the SLC applicable to P.R.I. (Primary Rate Interface) ISDN service. The effect of this rule interpretation will be to retard the development and implementation of new technologies, including such services as telecommuting, telemedicine, and real-time document sharing and editing. These applications will come on-line as soon as ISDN is allowed to compete in the marketplace as an affordable and accessible telecommunications service.

Further, increasing ISDN charges will almost certainly have the adverse economic effect of bringing in less revenue, not more, for potential ISDN applications because wide spread consumer use will be priced out of the marketplace.

As Title One of the 1934 Communications Act states, "It shall be the policy of the United States to encourage the provision of new technologies and services to the public." (Sec. 7(a)) The Order contravenes this clear public policy mandate of encouraging the growth and application of innovative new services. Therefore, I respectfully urges the FCC to rescind and reverse the above-referenced Order, and adopt an interpretation of the existing rules that does not impede the technological advances of ISDN. The application of the SLC to an ISDN line should be no more onerous than the SLC applied to POTS line: one SLC per line (not per channel).

Thank you for your immediate attention to this matter.

Sincerely,

Your name and signature here

cc. RUSSELL L. ARMER
Russell L. Armer

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APR 20 1995
FCC MAIL ROOM

3Com Corporation
5400 Bayfront Plaza, P.O. Box 58145
Santa Clara, CA 95052-8145

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BERGER

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April 17, 1995

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BERGER

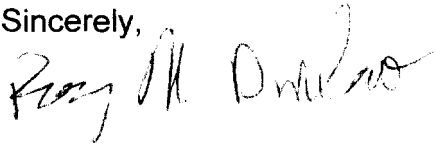
etal Fabrication

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Sincerely,



Roy Dumlao

cc.

Commissioner Andrew C. Barrett
Commissioner Rachelle B. Chong
Commissioner Susan Ness
Robert Pepper, Chief - Office of Plans and Policy
Commissioner James H. Quello

9 10 33 AM '95
April 14th 1995

Chairman Reed E. Hundt
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1919 M. Street, NW
Washington, DC 20554

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Sincerely,

Spencer

cc.

Commissioner Andrew C. Barrett

Commissioner Rachelle B. Chong

Commissioner Susan Ness

Robert Pepper, Chief - Office of Plans and Policy

Commissioner James H. Quello

*For the record
3587 Avenue 100
Trenton, NJ 08611
www.nj.gov*